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Attorneys for Defendant
Otto Trucking LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HAYES P. HYDE IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS REPLY
MOTION TO COMPEL WITH RESPECT
TO ITS SECOND SUBPOENA SERVED
ON NON-PARTY ANTHONY
LEVANDOWSKI [DKT. 1085]**

I, Hayes P. Hyde, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter, LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff's Administrative Motion to File Under Seal Portions of Its Motion to Compel With Respect to Its Second Subpoena Served on Non-Party Anthony Levandowski [Dkt. 1085] ("Motion").

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Motion	Marked portions (in red boxes)

3. The marked portions (in red boxes) of the Motion may include highly confidential, sensitive business information relating to the terms of Uber's agreements and corporate structure as well as confidential information of a third party. I understand that this information is not publicly known, and this information's confidentiality is strictly maintained.

4. Defendant's request to seal is narrowly tailored to those portions of the Plaintiff's Motion and its supporting papers that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 7th day of August, 2017 in San Francisco, California.

/s/ Hayes P. Hyde
Hayes P. Hyde

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on August 7, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 7th day of August 2017.

/s/ Hayes P. Hyde
Hayes P. Hyde